



**Peñuelas Valley Landfill, LLC.**  
**PO Box 918**  
**Punta Santiago, PR 00741-0918**

December 6, 2019

Team Leader  
Clean Water Act Team  
Multimedia Permits and Compliance Branch  
Caribbean Environmental Protection Division  
US Environmental Protection Agency, Region 2  
City View Plaza II, Suite 7000  
Guaynabo, PR 00968-8069

Director, Water Quality Area  
Department of Natural Resources and Environment  
PO Box 11488  
San Juan, PR 00910

**Re: Administrative Order on Consent**  
**DOCKET NUMBER CWA-02-2018-3104**  
**Peñuelas Valley Landfill**  
**Seventh Progress Report**

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the Seventh progress report that under the order is required on or before December 10, 2019, covering the months of October and November 2019. The order also requires the presentation of a comprehensive engineering analysis of measures within 180 days from the order date. This letter presents the summary of activities conducted in October and November 2019. The engineering analysis was presented to USEPA along with the third progress report on March 22, 2019.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform the comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP.

The site continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new controls have been installed in key areas of conveyance of storm water run-off. The attached photos show

2019 DEC -6 AM 6:27

the areas where silt fences and mulch have been installed. In addition, the site also continues to perform road water spraying for the control of fugitive dust and periodic road washing with water is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC was to increase the current capacity the sedimentation pond. PVL, using internal resources, has removed sediment from the pond during the period. This activity was completed November 2019 and has increased the treatment capacity of the sedimentation basin extensively. During the referenced period, additional sediment material/soil was removed. Approximately 10,575 cubic yards of sediment and soil was excavated and removed. The estimated cost of this earthwork is \$63,450.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in October 2019 was 2.54 inches. Total precipitation in November 2019 was 3.06 inches. Although there have been two consecutive rain events with low TSS levels below the regulatory limit, there has been no rain events since that time that has caused discharge from Pond 1 during the period. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The site will continue to monitor future discharges, but we have entered the dry season and precipitation during this period is very limited. There is no liquid in the primary (discharge) sedimentation pond, and some vegetation has established on the bottom and side slopes. The precipitation reports are attached for reference. Based on the current and historical weather patterns for the area we do not expect a discharge from Outfall 001 until March 2020 or later.

The attached photographs show the current condition of the primary and secondary sedimentation ponds and the intermediate berm that divides the sedimentation ponds. Also shown are drainage channels and areas that have been protected with riprap, ground wood, and silt fence.

It is our interest to bring this matter to closure as soon as practicable, but we must acknowledge that a third discharge sample may not be available for collection until March 2020 or even later.

The statement below follows the requirements of administrative order.


"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

December 6, 2019

Should you require additional information please contact Jaime Jaén at (787) 391-0074 or by email at [jjjaen@ecwaste.com](mailto:jjjaen@ecwaste.com), or Kevin Shaw at (912) 659-7179 or by email at [kshaw@ecwaste.com](mailto:kshaw@ecwaste.com).

Cordially,

**Peñuelas Valley Landfill, LLC.**



Randy Jensen  
CEO and President



*Photo 1 - Discharge structure to Outfall 001- No stormwater present near discharge pipe; vegetation has established on pond bottom and side slopes.*





*Photo 2 - Sedimentation pond inlet showing some vegetation and energy dissipater.*



*Photo 3 - Panoramic view of sedimentation pond inlet showing additional stormwater holding capacity.*



*Photo 4 - Panoramic view showing intermediate berm and area of previous excavation with stormwater.*





*Photo 5 - Panoramic view showing silt fences used to control erosion & sedimentation.*





*Photo 6 - Panoramic view showing mulch on landfill slopes to control erosion and sedimentation.*

December 6, 2019

## OCTOBER 2019 PRECIPITATION REPORT

## MONTHLY CLIMATOLOGICAL SUMMARY for OCT. 2019

NAME: PVL1 CITY: STATE:  
ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	81.0	84.9	2:00a	78.0	12:30p	0.0	16.0	0.00	7.4	19.0	12:30a	E
2	81.3	85.8	12:00m	78.4	4:30p	0.0	16.3	0.00	7.8	21.0	1:00a	ENE
3	81.3	86.7	11:30p	78.0	11:30a	0.0	16.3	0.00	7.5	20.0	11:00p	ENE
4	81.4	87.1	11:30p	76.4	2:30p	0.0	16.4	0.00	4.9	17.0	1:00a	ENE
5	81.9	87.6	11:00p	79.0	5:00p	0.0	16.9	0.00	7.9	19.0	12:30a	ENE
6	82.0	87.8	11:30p	78.6	1:30p	0.0	17.0	0.00	8.1	28.0	1:30a	E
7	82.9	88.4	11:30p	78.4	6:30p	0.0	17.9	0.00	9.6	29.0	11:00p	E
8	82.0	88.4	1:00a	78.4	3:30p	0.0	15.6	0.00	9.1	29.0	3:30a	E
9	81.0	87.2	12:30a	77.1	8:30a	0.0	16.0	0.00	6.6	27.0	12:30a	ENE
10	79.9	85.6	10:00p	75.5	2:00p	0.0	14.9	0.00	4.1	19.0	10:30p	ENE
11	80.5	87.2	9:30p	76.0	3:30p	0.0	15.5	0.00	5.4	22.0	10:30p	ENE
12	81.6	88.0	9:30p	76.9	3:30p	0.0	16.6	0.00	7.5	19.0	11:30p	ENE
13	81.5	87.7	8:30p	77.9	3:00p	0.0	16.5	0.00	6.9	19.0	9:00p	ENE
14	79.4	85.3	9:30p	74.6	3:00a	0.0	14.4	0.79	6.9	23.0	1:30a	E
15	79.8	85.9	9:30p	75.8	6:30a	0.0	14.8	0.00	5.9	17.0	10:00p	ENE
16	80.8	86.5	9:00p	77.2	3:30p	0.0	15.8	0.00	5.9	20.0	12:00m	ENE
17	78.6	85.6	8:30p	73.4	4:00a	0.0	13.6	0.92	4.4	29.0	2:00a	NE
18	80.9	85.8	10:30p	75.7	1:00p	0.0	15.9	0.00	9.5	25.0	2:30a	E
19	80.2	86.3	9:30p	74.9	4:30a	0.0	15.2	0.13	8.2	29.0	4:00a	ENE
20	81.1	86.7	9:30p	76.3	12:00p	0.0	16.1	0.00	5.8	28.0	11:00p	E
21	79.7	87.2	8:30p	75.5	1:30p	0.0	14.7	0.08	4.4	19.0	9:00p	ENE
22	79.8	86.5	10:00p	75.4	10:30a	0.0	14.8	0.03	6.0	20.0	11:00p	ENE
23	80.3	85.7	10:00p	76.9	5:30a	0.0	15.3	0.00	7.8	28.0	10:00p	E
24	80.3	85.6	10:00p	77.8	10:30a	0.0	15.3	0.04	7.8	27.0	9:30p	E
25	80.1	86.3	8:30p	74.9	3:00p	0.0	15.1	0.00	7.9	28.0	11:30p	E
26	78.8	85.3	10:30p	74.4	5:00a	0.0	13.8	0.53	7.1	26.0	1:30a	ENE
27	81.2	86.2	11:00p	77.9	10:00a	0.0	16.2	0.00	7.3	19.0	1:00a	E
28	80.2	85.9	8:00p	76.6	3:30p	0.0	15.2	0.00	5.5	19.0	1:00a	E
29	79.5	87.1	10:30p	73.9	11:00a	0.0	14.5	0.00	5.1	19.0	8:00p	ENE
30	80.0	86.2	10:00p	75.7	1:00p	0.0	15.0	0.00	5.5	19.0	10:00p	ENE
31	80.1	86.5	9:30p	74.0	12:00p	0.0	15.1	0.02	4.8	18.0	11:30p	ENE
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	80.6	88.4	7	73.4	17	0.0	482.7	2.54	6.7	29.0	7	E

Max &gt;= 90.0: 0

Max &lt;= 32.0: 0

Min &lt;= 32.0: 0

Min &lt;= 0.0: 0

Max Rain: 0.92 ON 10/17/19

Days of Rain: 8 (&gt;.01 in) 4 (&gt;.1 in) 0 (&gt;1 in)

Heat Base: 65.0 Cool Base: 65.0 Method: Integration

## NOVEMBER 2019 PRECIPITATION REPORT

## MONTHLY CLIMATOLOGICAL SUMMARY for NOV. 2019

NAME: PVL1 CITY: STATE:  
ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	77.7	84.6	9:00p	73.8	1:30a	0.0	12.7	0.89	7.1	20.0	12:30a	E
2	78.3	83.7	11:00p	73.9	4:30a	0.0	13.3	0.13	7.3	25.0	1:00a	E
3	77.5	84.0	9:30p	72.4	10:30a	0.0	12.5	0.65	5.0	20.0	10:00p	ENE
4	78.7	85.0	11:00p	74.1	4:00a	0.0	13.7	0.27	8.5	29.0	8:30p	E
5	80.7	85.6	10:30p	77.1	4:00p	0.0	15.7	0.00	8.9	29.0	12:30a	E
6	80.4	85.5	10:30p	76.2	6:00a	0.0	15.4	0.00	9.5	28.0	1:00a	E
7	80.4	84.8	10:00p	77.1	12:30p	0.0	15.4	0.00	8.7	26.0	8:30p	E
8	80.3	85.3	9:30p	77.1	12:00p	0.0	15.3	0.00	9.0	26.0	8:00p	E
9	80.7	85.8	9:30p	77.7	4:00p	0.0	15.7	0.02	9.5	25.0	12:30a	E
10	80.4	85.5	10:00p	77.2	11:30a	0.0	15.4	0.00	8.1	24.0	11:00p	E
11	79.6	85.3	9:00p	76.4	3:00p	0.0	14.6	0.00	8.9	25.0	10:00p	E
12	78.9	84.5	10:30p	75.3	2:00p	0.0	13.9	0.01	8.2	20.0	1:30a	ENE
13	80.0	86.1	8:30p	76.5	10:00a	0.0	15.0	0.00	6.9	22.0	11:00p	ENE
14	77.3	85.0	9:00p	72.5	3:30p	0.0	12.3	0.17	5.5	19.0	2:00a	ENE
15	77.1	83.8	10:30p	72.3	1:30p	0.0	12.1	0.13	2.8	16.0	10:30p	NE
16	78.9	85.1	7:30p	74.0	1:00p	0.0	13.9	0.00	2.6	18.0	9:30p	WSW
17	79.3	84.9	8:30p	74.7	12:30p	0.0	14.3	0.00	5.7	20.0	9:00p	ENE
18	79.9	86.6	9:30p	75.8	10:00a	0.0	14.9	0.00	5.8	19.0	10:00p	ENE
19	78.6	84.5	12:30a	74.8	8:00a	0.0	13.6	0.29	3.4	17.0	1:00a	NE
20	78.5	84.2	8:00p	74.4	4:00p	0.0	13.5	0.14	2.9	15.0	9:00p	NW
21	78.2	85.8	10:00p	72.4	1:30p	0.0	13.2	0.03	5.0	26.0	11:30p	ESE
22	78.6	86.0	10:00p	74.7	1:30p	0.0	13.6	0.00	6.0	28.0	7:30p	ESE
23	77.8	84.0	11:00p	71.3	1:00p	0.0	12.8	0.00	4.8	17.0	4:30a	E
24	79.3	85.9	10:00p	75.7	2:30p	0.0	14.3	0.00	8.1	20.0	9:00p	ENE
25	80.7	86.0	8:00p	77.3	11:30a	0.0	15.7	0.00	9.7	30.0	10:30p	E
26	81.0	88.1	9:00p	77.2	3:30p	0.0	16.0	0.00	6.9	22.0	11:00p	E
27	78.7	85.2	9:00p	73.0	1:30p	0.0	13.7	0.27	4.4	24.0	2:00a	ENE
28	77.7	83.8	11:00p	73.0	12:30p	0.0	12.7	0.03	3.2	16.0	11:00p	SSW
29	77.4	83.6	11:00p	71.9	3:30p	0.0	12.4	0.03	4.4	26.0	4:30a	ENE
30	77.9	84.3	9:00p	72.4	4:00p	0.0	12.9	0.00	4.7	21.0	5:30a	ENE
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	79.0	88.1	26	71.3	23	0.0	420.5	3.06	6.4	30.0	25	E

Max >= 90.0: 0

Max <= 32.0: 0

Min <= 32.0: 0

Min <= 0.0: 0

Max Rain: 0.89 ON 11/01/19

Days of Rain: 13 (>.01 in) 9 (>.1 in) 0 (>1 in)

Heat Base: 65.0 Cool Base: 65.0 Method: Integration